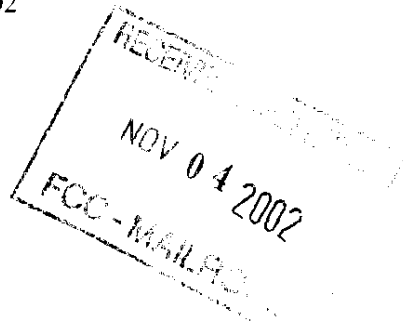




October 29, 2002

Via Electronic Filing
Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554



**Re: ET Docket No. 01-278 -- Review of Part 15 and other Parts of the Commission's Rules;
Sirius Satellite Radio Inc., Petition for Rulemaking; and
ET Docket No. 98-42 -- Amendment of Part 18 of the Commission's Rules to Update Regulations for RF Lighting Devices**

Dear Ms. Dortch:

The Automotive Multimedia Interface Collaboration ("AMI-C") hereby files this letter in support of the proposals of XM Radio Inc. ("XM") and Sirius Satellite Radio Inc. ("Sirius") in the above-captioned proceedings to limit the out-of-band emissions of unlicensed devices into the Satellite Digital Audio Radio Service ("SDARS") band (2320-2345 MHz) to no more than 18 μ V/m at 3 meters measured in a 2 MHz interval.

**AMI-C Objectives and the AMI-C Standard for
Unlicensed Devices to Protect SDARS Receivers**

AMI-C is an organization comprised of many of the world's major automotive manufacturers and their first-tier suppliers who establish common core requirements for mobile entertainment, information, and communications systems used in automobiles. Our members include the two major United States automobile makers, General Motors Corporation and Ford Motor Company, as well as FIAT, Honda, Nissan, PSA Peugeot Citreon, Renault and Toyota. We also coordinate with German automakers such as Daimler Chrysler.

One of AMI-C's goals is for automakers to collaborate with equipment suppliers to ensure that new RF based telematics products, such as SDARS radios, GPS receivers, and Bluetooth devices, being permanently integrated into and embedded in vehicles by automakers can coexist without causing interference to one another.

AMI-C is working to accommodate the new aftermarket installed technologies and customer "carry-on" technologies emerging in the automotive environment, but is concerned about the ability of these various RF devices and systems to coexist in the physically constrained automotive environment.

If the driving public is to benefit from these advanced RF technologies, emissions from these systems into other frequency bands must be set at reasonable levels. These standards must be made applicable to both aftermarket installed RF devices permanently added onto vehicles, and to those that can be introduced into the car environment, such as handheld or portable wireless devices. As the nation's spectrum manager, the FCC must protect the public by setting reasonable emissions standards now before these various RF devices proliferate in the market. By establishing reasonable and realizable standards now, the FCC will provide device manufacturers with sufficient time to accommodate these new limits.

AMI-C is currently working to develop a physical specification, which will define operational requirements for various RF devices to be embedded in vehicles. One of the elements of this specification is a limit on the energy RF devices can emit into the SDARS band (2320-2345 MHz) to ensure that they do not interfere with reception of satellite radio. Attached hereto is an excerpt from a near-final draft of the specification.

When adopted, this specification will require any AMI-C certified RF device embedded in a vehicle to limit emissions into the SDARS band to no more than $18 \mu\text{V/m}$ ($25 \text{ dB}\mu\text{V/m}$) at 3 meters measured in a 2 MHz interval. This is the same emissions limit both XM and Sirius have proposed for unlicensed devices operating exclusively inside of vehicles. See Comments of XM Radio Inc., ET Docket No. 01-278 (Feb. 12, 2002); Sirius Satellite Radio Inc., Petition for Rulemaking (Jan. 23, 2002).

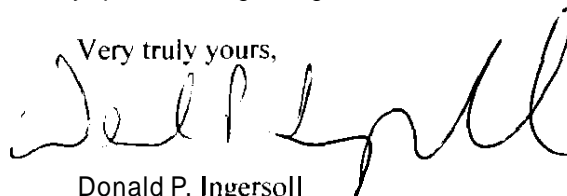
This emissions limit will ensure that Bluetooth and other RF devices used in vehicles do not cause interference to satellite radio reception. We understand that first-tier suppliers that are contributing to AMI-C specification development, such as Visteon and Delphi, support this emissions limit and have flowed this requirement down to their module suppliers. They believe that these modules can meet this limit with little additional unit cost. (AMI-C is also collaborating on an emissions limit to similarly protect GPS receivers in vehicles.)

Our specification, however, will apply only to AMI-C certified RF devices permanently installed in the automobile. There are a growing number of portable unlicensed devices operating in the 2.4 GHz band that the AMI-C physical specification cannot govern. These devices, such as Bluetooth-equipped cell phones and pagers, can be carried into and operate in automotive environments. Most of these devices are required by present FCC rules to restrict emissions into the SDARS band to $500 \mu\text{V/m}$ at 3 meters, a level that will render most licensed SDARS systems non-operational. AMI-C's specification cannot govern these devices because they are out of the control of the automaker. Nonetheless, these devices can cause the same interference to SDARS reception as devices embedded in the vehicle.

Conclusion

In conclusion, for the benefit of the American driving public, we urge the Commission to adopt the proposals referenced above. Please direct any questions regarding this matter to the undersigned.

Very truly yours,



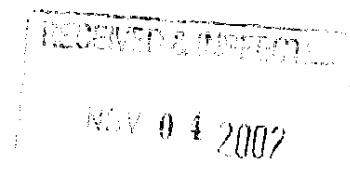
Donald P. Ingersoll
Vice President

Attachment:

Excerpt from Draft Specification 4001 AMI-C Physical Specification' version 0.8.1 (October 8, 2002).

4.10.5 Radiated emissions

Frequency (MHz)	dBuV/m	Comments
0.15...30	30	Plotted in typical CISPR format up to 1000 MHz
30...400	10	Plotted in typical CISPR format up to 1000 MHz
400...1000	22...32	Plotted in typical CISPR format up to 1000 MHz
1567-1574	50-10	Use of high gain (38 dB gain, 0.5 dB noise figure) Low Noise Amplifier is required to decrease noise floor, Plotted as individual band
1574-1576	10	
1576-1583	10-15	
2308...2362	25	Use of high gain (38 dB gain, 0.5 dB noise figure) Low Noise Amplifier is required to decrease noise floor, Plotted as individual band



¹ This draft specification is still undergoing internal review. Its content is therefore subject to change.